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11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

13 TRADELINE ENTERPRISES PVT.
14 LTD.,

15 Plaintiff,

16 vs.
17 JESS SMITH & SONS COTTON,
18 LLC; and J.G. BOSWELL COMPANY,

19 Defendant.

20 CASE No. 2:15-CV-8048-JAK
(RAOx)

21 **JOINT STATUS REPORT**

1 Plaintiff Tradeline Enterprises Pvt. Ltd. ("Tradeline"), Defendant Jess Smith
 2 & Sons Cotton, LLC ("Jess Smith"), and Defendant J. G. Boswell Company
 3 ("Boswell") respectfully submit this Joint Status Report.

4 The parties' October 15, 2019 Status Report, at pages 1 and 2 of Docket No.
 5 123, set forth a compromise procedure under which the first step was for
 6 Defendants' counsel to inspect the documents in Plaintiff's privilege log, subject to a
 7 stipulation of non-waiver of any privileges. That inspection proceeded on November
 8 7, 2019.

9 Immediately after the inspection, counsel for Boswell identified
 10 approximately 18 documents on Tradeline's privilege log that they believed to be
 11 discoverable, including the funding agreements. On November 20, 2019, Counsel
 12 for Tradeline completed the production of those documents according to the parties'
 13 compromise procedure. Now that the parties have successfully completed the
 14 compromise procedure set forth in Docket 123, Defendants now withdraw their
 15 prior opposition to the motion to withdraw by counsel for Tradeline, subject to the
 16 representation and agreement that the Quinn Emanuel law firm will retain all
 17 documents relating to or arising out of this action until they have been notified that
 18 it is no longer pending.

19 Moving forward, Defendants expect to: (1) conduct additional post-judgment
 20 discovery including, but not limited to, out-of-state subpoenas to Tradeline's
 21 litigation funders for documents, and depositions of representatives of the funders,
 22 both of which will likely require the assistance of Magistrate Judge Oliver for the
 23 issuance of orders that will permit the issuance of subpoenas in the appropriate
 24 federal district court in New York; and (2) renew their motion to amend the
 25 judgment as instructed by the Court when it deferred ruling on that issue, as
 26 reflected in the Court's ruling in Docket 111.

27 The parties will continue to apprise the Court of any developments and will
 28 file another status report on or before January 21, 2020.

1 Dated: November 26, 2019

Respectfully submitted,

2
3 **QUINN EMANUEL URQUHART**
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5 By: /s/ Dominic Surprenant .

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12 Dated: November 26, 2019

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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and not a party to this action. I
4 am employed in the County of Los Angeles, State of California. My business address is
One Wilshire Boulevard, Suite 2000, Los Angeles, CA 90017-3383.

5 On November 26, 2019, I served true copies of the following document(s) described
as **JOINT STATUS REPORT** on the interested parties in this action as follows:

6 **SERVICE LIST**

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JESS SMITH & SONS COTTON, LLC

19 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
20 document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the
case who are registered CM/ECF users will be served by the CM/ECF system.
21 Participants in the case who are not registered CM/ECF users will be served by mail or by
other means permitted by the court rules.

22 I declare under penalty of perjury under the laws of the United States of America
23 that the foregoing is true and correct and that I am employed in the office of a member of
the bar of this Court at whose direction the service was made.

24 Executed on November 26, 2019, at Los Angeles, California.

26 */s/ Mark Clark*
27 Mark Clark